

### III. REMARKS

Claims 1-29 are pending in this application. By this amendment, claims 1, 2, 4, 9, 14, 16, 20, 22 and 25 have been amended and claim 29 has been added. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 4, 14, 20 and 25 are objected to for informalities. Claims 1, 7-8, 16, 22, and 28 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Barritz (U.S. Patent Pub. No. 2001/0037258 A1), hereinafter "Barritz," in view of Mueller *et al.* (U.S. Patent No. 6,009,398), hereinafter "Mueller," further in view of Graber *et al.* (U.S. Patent No. 5,712,979), hereinafter "Graber," and further in view of Boehne *et al.* (U.S. Patent No. 6,343,500), hereinafter, "Boehne." Claims 2, 12, 18 and 23 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Barritz in view of Mueller, Graber and Boehne, and further in view of Yen *et al.* (U.S. Patent No. 6,724,918 B1), hereinafter "Yen," and further in view of Carrier, III *et al.* (U.S. Patent No. 5,960,196), hereinafter "Carrier, III." Claims 3, 19 and 24 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Barritz in view of Mueller, Graber and Boehne, and further in view of Stern (U.S. Patent No. 6,724,918), hereinafter "Stern." Claims 4, 20 and 25 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Barritz in view of Mueller, Graber, and Boehne, and further in view of Lemay ("Laura Lemay's Teach Yourself Web Publishing with HTML 4 in 14 Days", 1997, Sams.net),

hereinafter "Lemay," and further in view of Towers ("Visual Quickstart Guide: Dreamweaver 2 for Windows and Macintosh", 1999, Peachpit Press), hereinafter "Towers." Claims 5, 21 and 26 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Graber and Boehne, and further in view of Conant *et al.* (U.S. Patent Pub. No. 2002/0129056 A1), hereinafter "Conant," and further in view of Busch *et al.* (U.S. Patent No. 6,656,050 B2), hereinafter "Busch," and further in view of Daberko (U.S. Patent No. 5,787,445), hereinafter "Daberko." Claims 6, 17 and 27 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Graber and Boehne, and further in view of Helgeson *et al.* (U.S. Patent No. 6,643,652 B2), hereinafter Helgeson. Claim 9 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Graber, Boehne and Yen. Claims 10-11 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Graber, Boehne Yen and Helgeson. Claim 13 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Graber, Boehne, Yen, Carrier, III and Stern. Claim 14 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Graber, Boehne, Yen, Carrier, III, Stern, Lemar, and Towers. Claim 15 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Graber, Boehne, Yen, Carrier, III, Stern, Lemar, Towers, Conant, Busch, and Daberko. Applicants respectfully traverse these rejections for the following reasons indicated below.

**A. REJECTION OF CLAIMS 4, 14, 20 AND 25 FOR INFORMALITIES**

The Office has rejected claims 4, 14, 20 and 25 for allegedly containing informalities.

Applicants have amended claims 4, 14, 20 and 25 to recite, "...based on at least one predetermined criterion." Applicants assert that this amendment further directs the invention to statutory subject matter. Accordingly, Applicants request that the rejection be withdrawn.

**B. REJECTION OF CLAIMS 1, 7-8, 16, 22 AND 28 UNDER 35 U.S.C. §103(a) OVER BARRITZ, MUELLER, GRABER, AND BOEHNE**

With regard to the 35 U.S.C. §103(a) rejection over Barritz in view of Mueller, Graber, and Boehne, Applicants assert that the combined references cited by the Office fail to teach or suggest each and every element of the claimed invention. For example, with respect to independent claims 1, 16 and 22, Applicants respectfully submit that the combined references fail to teach or suggest, *inter alia*, that the website is adapted to be developed by a creator that has no knowledge of web-based programming. Instead, the passage of Barritz cited by the Office teaches "[a] website constructing tool for retailers [that] streamlines and substantially automates the task of creating a website for retailers that buy their merchandise from a plurality of vendors." Abstract. However, Barritz never teaches or suggests that its website constructing tool eliminates the need for a retailer to have any knowledge of web based programming. In contrast, the claimed invention includes "...wherein the website is adapted to be developed by a creator that has no knowledge of web-based programming. Claim 1. As such, the development of the website is not merely streamlined and substantially automated as with the website constructing tool of Barritz, but rather the need for any knowledge of web based programming on the part of the creator is eliminated. The website constructing tool of Barritz does not teach or suggest this

feature. None of Mueller, Gruber and Boehne cures this deficiency. Accordingly, Applicants respectfully request that the rejection be withdrawn.

With further respect to independent claim 16, Applicants respectfully submit that the combined references fail to teach or suggest, *inter alia*, that the creator groups include creators chosen from the group consisting of: authors, editors and administrators. As stated above, Barritz teaches a web constructing tool for retailers. Barritz, however, never teaches that a retailer may be an author, an editor, or an administrator. In contrast, the claimed invention includes "...wherein the creator groups include creators chosen from the group consisting of: authors, editors and administrators." Claim 16. To this extent, the creator groups of the claimed invention are not merely retailers as in Barritz, but instead include creators chosen from the group consisting of: authors, editors and administrators. Thus, Barritz does not teach or suggest the creator groups of the claimed invention. None of Mueller, Gruber, and Boehne cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

**C. REJECTION OF CLAIMS 2, 12, 18 and 23 UNDER 35 U.S.C. §103(a) OVER BARRITZ, MUELLER, GRABER, BOEHNE, YEN, AND CARRIER III**

With regard to the 35 U.S.C. §103(a) rejection over Barritz in view of Mueller, Gruber, Boehne, Yen, and Carrier III, Applicants assert that the combined references cited by the Office fail to teach or suggest each and every element of the claimed invention. For example, with respect to claims 2 and 23, Applicants respectfully submit that the combined references fail to teach or suggest, *inter alia*, a category system for defining the categories into which content is arranged and assigning creator groups thereto, wherein the content for the categories can be defined only by the assigned creator groups. The Office admits that Barritz, Mueller, Gruber and

Bochne fail to teach this feature. Instead, the Office relies on a passage of Yen, which describes an editing mode that allows a client to add sketch information to a retrieved document as well as recording "...audio and/or video information to contribute to collaborative creation of a document." Col. 5, lines 35-55. To this extent, the client in Yen is allowed to contribute to creation of the entire document and is not limited to a particular category or section of the document.

Furthermore, Yen defines the sketch information that the client is allowed to contribute as "...created as an independent element of a more complex free hand drawing and/or to encircle or underline a feature of a background image that is displayed by the system in the viewable area." Col. 8, lines 8-11. As such, Yen does not allow its client unlimited access for defining content in a particular section, but instead only allows the client overlay access, such as for creating a freehand drawing or encircling or underlining an existing feature. Still further, Yen never teaches or suggests that only members of a creator group may define content but rather teaches that there is a pre-existing feature that may be underlined or encircled.

The claimed invention, in contrast, includes "...a category system for defining the categories [into which content is arranged] and assigning creator groups thereto, wherein the content for the categories can be defined only by the assigned creator groups." Claim 1. As such, the creator groups of the claimed invention do not simply draw upon, encircle, or underline content that has been previously created by another as in Yen, but instead only the assigned creator groups can define the content. In addition, the category system of the claimed invention defines categories, the content for which can only be defined by the assigned creator groups, as opposed to Yen in which the client contributes to the content of the entire document. For the

above reasons, the category system of the claimed invention is not taught or suggested by the editing mode of Yen. None of Barritz, Mueller, Gruber, Boehne, and Carrier III cures this deficiency. Accordingly, Applicants respectfully request that the rejection be withdrawn.

With further respect to claims 2 and 23, Applicants respectfully submit that, as argued above with respect to independent claim 16, the cited references fail to teach or suggest, *inter alia*, that the creator groups include creators chosen from the group consisting of: authors, editors and administrators. In addition, with respect to the Yen reference, Applicants submit that, as argued above, Yen teaches a client that may add sketch information and record audio and/or video information to contribute to collaborative creation of a document. Yen, however, never teaches that a client may be an author, an editor, or an administrator. In contrast, the claimed invention includes "...wherein the creator groups include creators chosen from the group consisting of: authors, editors and administrators." Claim 2. To this extent, the creator groups of the claimed invention are not merely generic clients as in Yen, but instead include creators chosen from the group consisting of: authors, editors and administrators. Thus, Yen does not teach or suggest the creator groups of the claimed invention. None of Mueller, Gruber, Boehne, and Carrier III cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

**D. REJECTION OF CLAIMS 3-6, 9-11, 13-15, 17, 19-21 and 24-27 UNDER 35 U.S.C. §103(a)**

With regard to the Office's other 35 U.S.C. §103(a) rejections, Applicants submit that the combined features of the cited art fail to teach each and every feature of the claimed invention. For example, with respect to independent claim 9, as argued above with respect to independent

claims 1, 16 and 22, the cited references fail to teach or suggest a category system for defining the categories into which content is arranged and assigning creator groups thereto, wherein the content for the categories can be defined only by the assigned creator groups. With further respect to independent claim 9, as argued above with respect to independent claim 16 and dependent claims 2 and 23, the cited references fail to teach or suggest, *inter alia*, that the creator groups include creators chosen from the group consisting of: authors, editors and administrators. With still further respect to independent claim 9, as argued above with respect to dependent claims 2 and 23, the cited references fail to teach or suggest, *inter alia*, a category system for defining the categories into which content is arranged and assigning creator groups thereto, wherein the content for the categories can be defined only by the assigned creator groups. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

#### E. NEWLY ADDED CLAIM 29

With regard to newly added independent claim 29, Applicants submit that the cited references do not teach or suggest each and every feature of the claimed invention. Accordingly, Applicants submit that the claim is in condition for allowance.

**IV. CONCLUSION**

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, he is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,



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